

INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST-5375. The Department of Ecology (the Department) is proposing to issue this permit, which will allow discharge of wastewater to the City of Moses Lake, Larson treatment plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D—Response to Comments.

<u>GENERAL INFORMATION</u>	
Applicant	Moses Lake Industries, Inc.
Facility Name and Address	8248 Randolph Road N.E. Moses Lake, WA 98837
Type of Facility:	Manufacturer of tetramethylammonium hydroxide (TMAH) aqueous solution; and formulation of copper electroplating solutions, plating additive solutions, aqueous sodium carbonate solutions, and laboratory reagents
Facility Discharge Location	Latitude: 47° 12' 32" N Longitude: 119° 17' 15" W.
Treatment Plant Receiving Discharge	City of Moses Lake, Larson Treatment Plant
Contact at Facility	Mike Harvey, Executive Vice President Telephone #: (509) 762-5336 Fax #: (509) 762-5981

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BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

Moses Lake Industries, located at the Port of Moses Lake (see Figure 1), manufactures and repackages specialty chemicals for use in the semiconductor industry. The company's products include tetramethylammonium hydroxide (TMAH) solutions in water; formulation of copper electroplating solutions, plating additive solutions, aqueous sodium carbonate solutions, and laboratory reagents.

TMAH (the company's main product) is produced by the electrolysis of a quaternary ammonium compound (tetramethylammonium carbonate, which is also manufactured at the facility). Wastewaters from the facility are discharged to the City of Moses Lake, Larson treatment plant; to the Port of Moses Lake, Land Application System; and onsite as landscape irrigation.

The facility is a subject to categorical pretreatment standards found in 40 CFR Part 414, Subpart H, Specialty Organic Chemicals. As such, the facility is a significant industrial user.

INDUSTRIAL PROCESSES

Process water is supplied from the City of Moses Lake. Before use as process water, city water is deionized by either reverse osmosis (RO) or ion exchange water treatment systems. The RO reject water is sent to the Port of Moses Lake, Land Application System or used for onsite landscape irrigation. RO reject water flow averages about 8,000 gpd with a maximum daily flow of 24,000 gpd. All ion exchange resins are sent offsite for regeneration.

Process contaminated wastewater is generated from container cleaning in the TMAH repackaging area. Generally, TMAH containers are returned from the customer for reuse. Any residual TMAH is pumped from the containers and handled as a dangerous waste. The containers are then rinsed with deionized water prior to refilling. The rinse water is pumped to a 1,600 gallon batch treatment tank, pH adjusted, then discharged to the City of Moses Lake, Larson treatment system. Sulfuric acid is used to adjust pH in the treatment tank. Discharge flow averages about 6,300 gpd, with a maximum daily flow of 16,900 gpd.

There is no wastewater discharge from the formulation of copper electroplating solutions, plating additive solutions, aqueous sodium carbonate solutions, and formulation of laboratory reagents. All waste process solutions are handled as dangerous waste.

PERMIT STATUS

The previous permit for this facility was issued on July 1, 2001. An application for permit renewal was submitted to the Department on January 31, 2006 and accepted by the Department on May 1, 2006.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

During the history of the previous permit, the Permittee has generally remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department. There have been a few permit excursions since January, 2003. These included two process wastewater pH excursions (in January and November, 2003 - due to incorrect pH adjustments), a process wastewater BOD exceedence (in

March 2006 - which is still being investigated); and a flow exceedence for RO reject irrigation water (in September, 2005).

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized in Tables 1 through 4, located in Appendix C. Waste streams sampled at the facility include Process Wastewater (Table 1); Combined Process and Sanitary Wastewater Discharged to the Larson Treatment System (Table 2); and RO Reject Water used for Onsite Irrigation, and RO Reject Wastewater Discharge to the Port of Moses Lake (Tables 3 and 4 respectively). There have been no detectable concentrations of parameters listed in the Categorical Pretreatment Standards (Table 5).

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The minimum requirements to demonstrate compliance with the AKART standard and specific design criteria for this facility were determined in the facility's initial engineering report submitting in 1995.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR Part 414, Subpart H – Specialty Organic Chemicals. Table 5 lists Pretreatment Standards for Existing Sources (PSES) from Subpart H. These standards are expressed in concentrations ($\mu\text{g/L}$). However, the subpart states that mass limits shall be applied by determining the process wastewater flow subject to this subpart times these concentrations. The mass limits have been expressed in grams per day.

EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the City of Moses Lake, Larson treatment plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the City of Moses Lake (codified in ordinance). Applicable limits for this discharge set by the City of Moses Lake include BOD₅ (limit of 300 mg/L), TSS (limit of 350 mg/L) and pH (within the range 6.0 to 11.0).

Table 6, Appendix C, compares overall loading from the facility to the City of Moses Lake, Larson Treatment Plant. The 2005 SWD permit application requested an increase in flow and TDS permit levels in the process wastewater discharge to accommodate an increase in TMAH production. The requested increases appear to be minor, and no pass-through, interference,

concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels are expected.

Similarly, in order to protect the Port of Moses Lake, Land Treatment System from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based on local limits established by the Port of Moses Lake (codified in their Industrial Process Water Treatment Facility Use Resolution No. 1157). Applicable limits for this discharge set by the Port of Moses Lake are listed in Table 7, Appendix C. A monthly average flow limit to the Port's system has also been set at 30,000 gpd.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED AUGUST 7, 1996

The table below compares existing permit limits with proposed permit limits. Proposed permit limits for process wastewater flow have increased from 10,000 to 13,000 gpd, monthly average and 17,000 to 24,000 gpd, daily maximum. The TDS limit has been increased from 42 to 62 lbs/day, monthly average. As discussed above, these increases were requested by the Permittee in their SWD permit application. The proposed permit includes a new total suspended solids (TSS) limit of 350 mg/L, based on City of Moses Lake local limits.

Since the process wastewater flow has increased, revised mass limitations for parameters regulated by the pretreatment standards for existing sources in the specialty chemicals effluent guidelines could be calculated. However, the Permittee has met the existing permit limits for these parameters. Therefore, these limits have not changed in the proposed permit. In the previous permit, the effluent limit for fluoranthene was calculated incorrectly. The correct limit is reflected in the table below for the proposed effluent limitation.

The proposed permit also contains new limitations based on the Port of Moses Lake local limits (see Table 7, Appendix C).

Parameter	EXISTING EFFLUENT LIMITATIONS		PROPOSED EFFLUENT LIMITATIONS	
	Maximum Daily	Average Monthly	Maximum Daily	Average Monthly
Flow, gpd	17,000	10,000	24,000	13,000
pH, s.u.	within the range 6.0 to 11.0		within the range 6.0 to 11.0	
BOD ₅ , mg/L	-	300	-	300
TSS, mg/L	-	-	-	350
TDS, lbs/day	-	42	-	63
Pretreatment Standards for Existing Sources Table 5 Appendix C *	see appendix C ¹	see appendix C ¹	see appendix C ²	see appendix C ²
Fluoranthene, g/day ³	1.8	0.8	2.0	0.8

¹ Existing effluent limitations for pretreatment standards are listed in Table 5, Appendix C, expressed in µg/L.

² Proposed effluent limitations for pretreatment standards are listed in Table 5, Appendix C expressed in g/day.
The proposed effluent limitations are the same as the existing limitations, with the exception of Fluoranthene.

³ The effluent limitation for Fluoranthene was reported incorrectly in the previous permit. The proposed limit reflects the correction.

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S3 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges (WAC 173-216-110 and 40 CFR 403.12 (e),(g), and (h)).

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.5. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment. The Permittee has developed a detailed operation and maintenance plan for their wastewater treatment system. The proposed permit requires submission of an update of this O&M manual.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SPILL PLAN

The Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The Permittee has developed a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The proposed permit requires the Permittee to update this plan and submit it to the Department.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for five years.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology.

Laws and Regulations(<http://www.ecy.wa.gov/laws-rules/index.html>)

Permit and Wastewater Related Information

(<http://www.ecy.wa.gov/programs/wq/wastewater/index.html>)

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on February 7 and February 14, 2006 in the Columbia Basin Herald to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department published a Public Notice of Draft (PNOD) on June 22, 2006 in the Columbia Basin Herald to inform the public that a draft permit and fact sheet was available for review. Interested persons were invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Eastern Regional Office
4601 North Monroe Street
Spokane, WA 99205-1295

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, (509) 329-3400 or by writing to the address listed above.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be “time-composite”(collected at constant time intervals) or “flow-proportional” (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring—Uninterrupted, unless otherwise noted in the permit.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the-State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

- 1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water

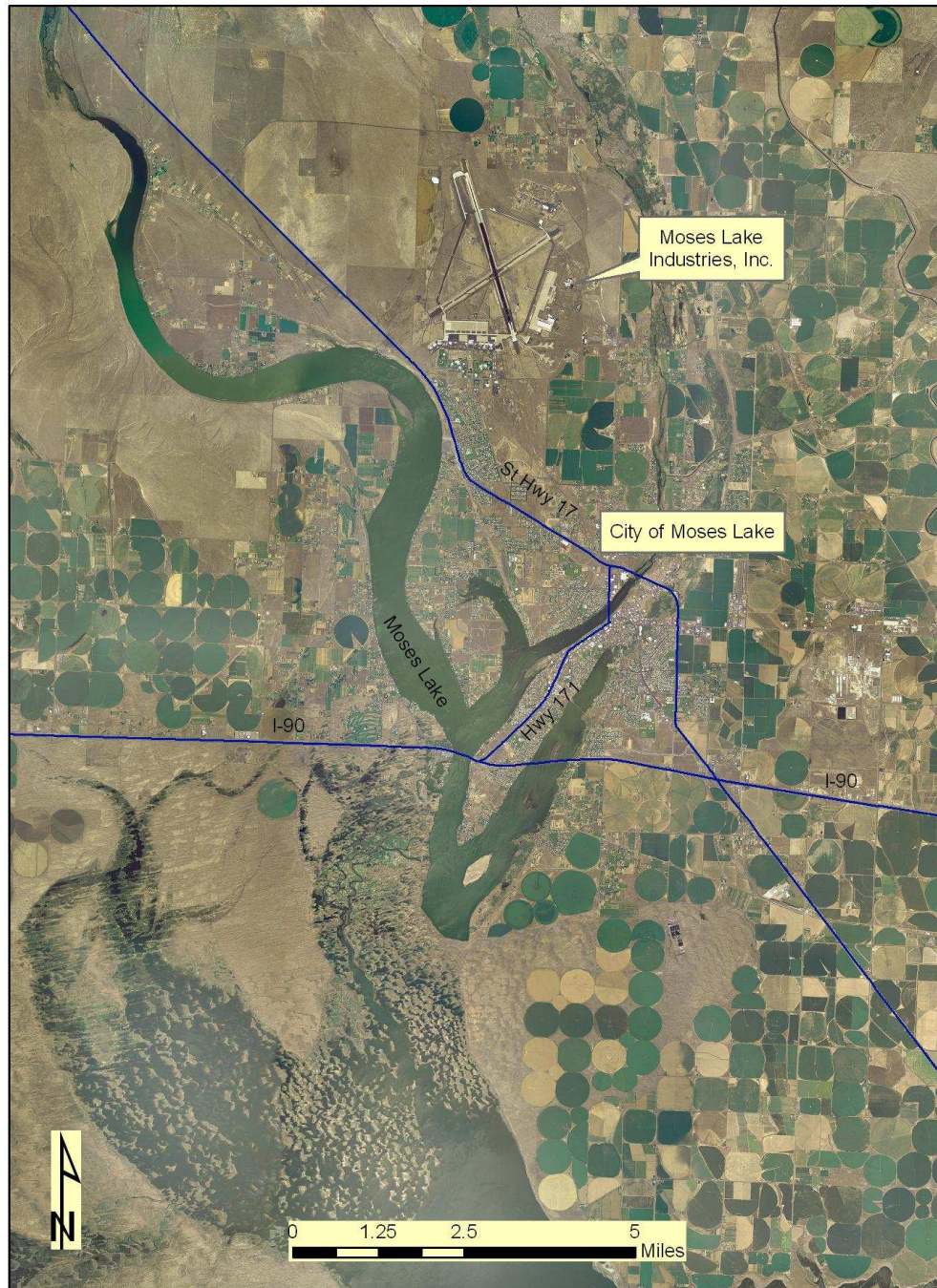


Figure1. Moses Lake Industries, Inc.

APPENDIX C—TABLES

Table 1. Process Wastewater Effluent Sampling Summary (to Larson Treatment Plant), Moses Lake Industries

Date	Flow (gpd)	pH (s.u.)			Cond (µmho/cm)		TDS (lbs/day)		NH3 (mg/L as N)	TKN (mg/L as N)	NO3+NO2 (mg/L as N)	Total N ** (lbs/day)	BOD		Chloride (mg/L)	Sodium (mg/l)
	Avg	Max	Max	Min	Max	Min	Avg	Max					(mg/l)	(lbs/day) **		
Jan-03	5,085	9,148	8.4	5.9	730	300	10.5	17.7	0.26	4.22	2.9	0.30	69	2.9	16.8	8
Feb-03	4,760	7,891	8.5	6.0	840	310	12.9	18.9	0.15	12.92	2.18	0.60	89	3.5	6.5	15.9
Mar-03	4,951	9,230	8.3	6.0	1,067	350	15.3	22.1	0.47	5.38	2.36	0.32	80	3.3	7	32.6
Apr-03	4,642	7,532	8.3	6.0	830	416	15.7	42.2	0.12	12.82	1.76	0.56	162	6.3	10	28.2
May-03	6,605	8,309	8.4	6.0	770	361	17.5	23	0.12	21	5.64	1.47	2	0.1	6	15.3
Jun-03	4,932	7,697	8.4	6.0	704	422	21.5	89.1	1.4	24.8	3.95	1.18	208	8.6	5.5	22
Jul-03	4,544	7,944	8.3	6.0	643	248	11.2	11.2	0.95	17	2.38	0.73	159	6.0	7.5	28.9
Aug-03	4,614	7,570	8.3	6.0	819	231	9.2	17	0.42	9.54	2.82	0.48	8	0.3	6.5	24.6
Sep-03	4,760	7,981	8.7	6.1	909	239	9.2	13.3	2.32	10.94	5.97	0.67	6	0.2	8	41.9
Oct-03	4,674	6,747	8.5	6.0	715	207	10.3	17.6	0.57	9.98	2.4	0.48	16	0.6	8	23.09
Nov-03	5,947	11,729	8.4	4.9	943	203	14.1	22.9	0.17	9.48	3.21	0.63	141	7.0	7	19.9
Dec-03	5,477	9,126	8.5	6.1	730	118	9.1	16.7	0.48	8.94	2.4	0.52	65	3.0	9	21.9
Jan-04	6,726	14,579	8.3	6.0	3,570	82	17.6	37.4	1.96	7.8	1.7	0.53	19	1.0	13.5	48
Feb-04	6,598	10,008	8.4	6.3	1,578	234	16.6	36.5	0.12	33.4	1.94	1.94	38	2.1	10	40.8
Mar-04	6,363	10,846	8.4	6.7	1,290	136	15.2	27.2	0.33	7.83	0.67	0.45	99	5.3	11.5	47.1
Apr-04	6,347	10,517	8.4	6.0	1,665	130	15.3	34.8	0.12	3.62	1.61	0.28	68	3.6	8.5	28.8
May-04	5,771	11,624	8.5	6.2	1,733	190	11.3	28.3	0.12	16.5	2.67	0.92	59	2.8	8.5	23.7
Jun-04	5,672	9,223	8.9	6.1	1,215	239	12.4	24.9	0.12	13.5	2.37	0.75	49	2.3	10	24.9
Jul-04	5,258	9,141	8.5	6.0	961	238	11	20.4	0.44	9.24	2.55	0.52	70	3.1	6	19
Aug-04	5,563	8,961	8.5	6.0	961	238	19.9	32.6	0.98	16.5	2.43	0.88	85	3.9	6	35.5
Sep-04	6,350	10,831	8.5	6.6	1,693	299	22.3	34.7	1.97	12.2	0.09	0.65	21	1.1	9	19.5
Oct-04	5,784	9,544	8.4	6.3	1,105	391	19.6	26.5	0.12	40.8	2.77	2.10	85	4.1	10	21.2
Dec-04	5,352	9,111	8.4	6.8	991	287	13.8	26.8	1.06	11.6	2.41	0.63	59	2.6	9	25.3
Jan-05	5,589	9,245	8.4	6.1	795	247	14.6	18.8	0.12	0.72	3.13	0.18	103	4.8	12.5	22.55
Feb-05	5,724	9,948	8.0	6.1	693	202	11.7	14.3	1.51	11.3	2.99	0.68	23	1.1	7.5	19.7
Mar-05	6,596	9,313	8.4	6.1	578	102	14.5	18.9	0.27	3.54	1.9	0.30	18	1.0	5.5	22.5

Table 1. Process Wastewater Effluent Sampling Summary (to Larson Treatment Plant), Moses Lake Industries

Date	Flow (gpd)	pH (s.u.)			Cond (µmho/cm)		TDS (lbs/day)		NH3 (mg/L as N)	TKN (mg/L as N)	NO3+NO2 (mg/L as N)	Total N ** (lbs/day)	BOD		Chloride (mg/L)	Sodium (mg/l)
	Avg	Max	Max	Min	Max	Min	Avg	Max					(mg/l)	(lbs/day) **		
Apr-05	6,184	9,193	8.4	6.1	697	97	14.3	18.1	1.87	6.19	2.88	0.47	52	2.7	4	16.6
May-05	6,506	9,717	8.3	6.2	1,031	27	12.4	18.1	1.34	8.74	2.04	0.58	63	3.4	2.5	24.5
Jun-05	6,638	9,926	8.3	6.4	1,588	119	19.5	40.3	1.82	4.9	2.7	0.42	53	2.9	5	18.1
Jul-05	6,009	9,597	8.3	6.8	608	149	16.4	24.7	0.23	29.3	2.93	1.62	112	5.6	5	10.3
Aug-05	6,857	10,158	8.7	6.2	726	164	17.5	24.3	2.06	4.89	1.85	0.39	18	1.0	2	16.2
Sep-05	7,701	11,766	8.5	6.6	1,654	201	19.2	26.8	1.95	27.3	1.37	1.84	40	2.6	6	19.2
Oct-05	7,715	11,355	8.4	6.0	1,431	237	19.6	25.2	3.31	7.63	5.13	0.82	24	1.5	5	17.2
Nov-05	8,389	12,260	8.4	6.0	916	225	26.9	37.9	1.9	21	2.08	1.61	127	8.9	5	18.3
Dec-05	9,173	16,396	9.0	6.2	1,306	161	22.8	44.9	1.07	7.07	1.86	0.68	33	2.5	2.5	20.6
Jan-06	8,980	12,327	8.4	6.0	713	116	24	37.2	3.26	13.9	2.74	1.25	48	3.6	4	18.3
Feb-06	8,970	12,477	8.4	6.1	596	168	21.2	34.5	2.23	5.97	1.86	0.59	18	1.3	2	14.93
Mar-06	9,634	16,888	8.6	6.1	910	123	28.2	46.3	2.73	9.5	2.04	0.93	683	54.9	10	21.6

Min	4,544	6,747	8.0	4.9	578	27	9.1	11.2	0.12	0.72	0.09	0.18	2	0.1	2	8
Avg	6,248	10,154	8.4	6.1	1,071	216	16.2	28.2	1.06	12.68	2.54	0.79	81	4.5	7	24
Max	9,634	16,888	9.0	6.8	3,570	422	28.2	89.1	3.31	40.80	5.97	2.10	683	54.9	17	48

Permit Limits

Min	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-
Avg	10,000	-	-	-	-	-	42	-	-	-	-	-	300	-	-	-
Max	-	17,000	11	-	-	-	-	-	-	-	-	-	-	-	-	-

** calculated parameters

Table 2. Combined Process and Sanitary Wastewater Effluent Summary (to Larson Treatment Plant), Moses Lake Industries

Date	BOD (mg/l)	Cond (µmho/cm)		pH (s.u.)	
		Max	Min	Max	Min
Jan-03	73	687	289	8.6	6.8
Feb-03	74.2	796	289	9	7.2
Mar-03	66	434	271	8.7	7.1
Apr-03	108	668	109	9.4	7.1
May-03	351	615	307	9.1	6.8
Jun-03	255	796	307	8.6	6.5
Jul-03	79	705	145	8.9	6.8
Aug-03	11.5	561	289	8.7	6.7
Sep-03	34.9	687	217	8.7	7.3
Oct-03	416	796	307	8.8	7.3
Nov-03	208	651	271	8.8	7.4
Dec-03	141	615	326	8.9	7.3
Jan-04	61	940	326	8.8	7.2
Feb-04	182	760	326	9	6.9
Mar-04	122	597	307	8.7	7.2
Apr-04	78.8	651	289	8.5	7.3
May-04	58	705	289	8.8	7
Jun-04	54	795	289	8.6	7
Jul-04	170	683	328	8.6	7
Aug-04	118	685	344	7.9	6.4
Sep-04	106	620	340	7.8	6.6
Oct-04	213	720	350	7.6	6.6
Dec-04	200	710	420	7.8	6.6
Jan-05	163	620	400	8	6.5
Feb-05	99	600	220	7.8	6.6
Mar-05	18	580	370	7.8	6.6
Apr-05	67	560	180	7.8	6.6
May-05	173	580	320	7.6	6.4
Jun-05	110	920	340	7.6	6.6
Jul-05	118	570	340	7.6	6.4
Aug-05	28	510	360	7.5	6.5
Sep-05	226	520	350	7.6	6.6
Oct-05	45	510	350	7.4	6.5
Nov-05	59	540	370	7.5	6.6
Dec-05	63	540	310	7.7	6.2
Jan-06	260	500	330	7.3	6.4
Feb-06	53	500	320	7.5	6.2
Mar-06	713	660	300	7.5	6.4
Min	12	434	109	7	6
Avg	141	647	305	8	7
Max	713	940	420	9	7

Table 3. RO Reject Water Discharge Summary (Onsite Irrigation), Moses Lake Industries

Date	Flow (gpd)		Cond (µmhos/cm)	TKN (mg/L)	pH (s.u.)	TDS (mg/L)
	Avg	Max				
Jan-03	-	-	-	-	-	-
Feb-03	-	-	-	-	-	-
Mar-03	7,986	10,963	743	13.08	7.9	544
Apr-03	-	-	-	-	-	-
May-03	5,765	8,309	-	-	-	-
Jun-03	7,031	8,927	-	-	-	-
Jul-03	7,407	8,581	784	0.76	8.14	528
Aug-03	-	-	-	-	-	-
Sep-03	6,196	8,321	611	1.01	8	406
Oct-03	5,317	10,016	-	-	-	-
Nov-03	-	-	-	-	-	-
Dec-03	-	-	-	-	-	-
Jan-04	-	-	-	-	-	-
Feb-04	-	-	-	-	-	-
Mar-04	-	-	-	-	-	-
Apr-04	8,353	8,848	-	-	-	-
May-04	7,941	10,220	-	-	-	-
Jun-04	7,940	9,529	799	1.98	7.2	524
Jul-04	6,801	8,033	-	-	-	-
Aug-04	6,281	8,384	-	-	-	-
Sep-04	7,496	9,772	1050	3	7.8	822
Oct-04	5,744	9,912	-	-	-	-
Dec-04	-	-	1039	0.72	7.9	816
Jan-05	-	-	-	-	-	-
Feb-05	-	-	-	-	-	-
Mar-05	-	-	-	-	-	-
Apr-05	6,919	9,351	-	-	-	-
May-05	7,124	6,825	-	-	-	-
Jun-05	8,326	12,209	-	-	-	-
Jul-05	8,912	13,845	-	-	-	-
Aug-05	11,614	15,012	-	-	-	-
Sep-05	12,940	17,162	-	-	-	-
Oct-05	11,717	16,561	-	-	-	-
Nov-05	-	-	-	-	-	-
Dec-05	-	-	896	0.72	7.8	604
Jan-06	-	-	-	-	-	-
Feb-06	-	-	-	-	-	-
Mar-06	-	-	-	-	-	-
Min	5,317	6,825	611	0.72	7.20	406
Avg	7,891	10,539	846	3.04	7.82	606
Max	12,940	17,162	1,050	13.08	8.14	822

Permit Limits*

Min	-	-	-	-	-	-
Avg	12,000	-	-	-	-	-
Max	-	-	-	-	-	-

* contained in January 24, 2002 SWD permit application, **bold** numbers represent exceedences.

Table 4 - RO Reject Water Discharge Summary (to Port of Moses Lake), Moses Lake Industries

Date	Flow (gpd)		pH (s.u.)	TDS (mg/L)	NH3 (mg/L)	TKN (mg/L)	NO3+NO2 (mg/L)	Chloride (mg/L)	Sodium (mg/l)
	Avg	Max							
Jan-03	7,488	9,350	7.9	600	0.13	1.46	2.5	12	47
Feb-03	7,966	10,472	7.8	532	0.12	2.28	1.9	9	45.8
Mar-03	-	-	7.9	544	1.18	13.08	1.46	13	52.3
Apr-03	6,787	8,141	8	652	0.12	1.16	2.64	25	96.5
May-03	840	7,291	n/r	n/r	n/r	n/r	n/r	n/r	n/r
Jun-03	-	-	8.1	592	0.12	0.72	3.18	15.5	69
Jul-03	-	-	8.1	528	0.12	0.76	2.9	18.5	62.1
Aug-03	6,857	8,848	8.1	620	0.23	0.72	2.63	18	60
Sep-03	-	-	-	-	-	-	-	-	-
Oct-03	1,970	9,300	8	678	0.12	0.72	3.8	24	89.2
Nov-03	6,871	9,951	7.8	750	0.12	2.68	3.14	23.5	88.2
Dec-03	7,155	9,275	7.2	498	0.12	1.6	0.48	25	117.6
Jan-04	9,588	14,162	7.4	388	0.12	0.72	0.25	21	93.8
Feb-04	9,646	13,618	7.6	470	0.12	0.72	0.044	27	112.6
Mar-04	9,157	10,908	5.3	490	0.12	1.89	2.63	16.5	70.6
Apr-04	-	-	-	-	-	-	-	-	-
May-04	-	-	7.1	486	0.12	2.84	2.59	12.5	54.3
Jun-04	-	-	-	-	-	-	-	-	-
Jul-04	-	-	6.6	684	0.13	5.08	4.45	17	61.7
Aug-04	-	-	6.4	808	0.15	3.96	4.98	20.5	62.2
Sep-04	-	-	7.8	822	0.28	3	4.05	20.5	61.1
Oct-04	1,444	8,729	8	984	0.12	0.72	4.6	25	73.9
Dec-04	7,392	10,212	7.9	816	0.23	0.72	3.82	24	76.4
Jan-05	7,385	10,006	7.7	578	0.12	1.51	3.1	14.5	54.24
Feb-05	7,700	9,287	7.9	740	0.12	0.72	4.01	15	68.5
Mar-05	6,643	9,158	8	618	<0.12	1.09	3.3	11.5	65.1
Apr-05	-	-	8	660	0.12	0.72	3.78	12.5	65
May-05	-	-	7.9	644	0.15	1.64	3.88	14	64.3
Jun-05	-	-	7.1	224	0.25	0.77	4.59	13.7	56.5
Jul-05	-	-	7.9	796	0.12	1.46	5.01	20	69.6
Aug-05	-	-	7.9	952	0.12	2.15	5.1	17.5	73.6
Sep-05	-	-	7.8	558	0.12	1.7	2.48	10	45.8
Oct-05	2,118	14,310	7.9	920	0.14	1.36	3.57	15.8	58.1
Nov-05	14,308	18,341	7.8	774	0.12	0.72	3.33	17	60
Dec-05	15,030	20,466	7.8	604	0.12	0.72	2.12	14.2	65.2
Jan-06	17,520	20,572	7.8	614	0.12	1.71	3.03	3	49.5
Feb-06	18,336	23,694	7.7	510	1.33	3	2.54	14.4	49.3
Mar-06	19,367	22,095	7.7	566	<1	<0.72	3.25	16	63.8
Min	840	7,291	5	224	<0.12	<0.72	0.04	3	46
Avg	8,708	12,645	8	638	0.21	1.94	3.09	17	68
Max	19,367	23,694	8	984	1.33	13.08	5.10	27	118

Permit Limits*

Min	-	-	-	-	-	-	-	-	-
Avg	-	-	-	-	-	-	-	-	-
Max	-	30,000	-	-	-	-	-	-	-

*contained in January 24, 2002 SWD permit application

Table 5. Pretreatment Standards for Existing Sources (40 CFR Part 414, Subpart H, Specialty Organic Chemicals)

Parameter	Pretreatment Standards for Existing Sources			
	Concentration Limits, µg/L		Mass Limits, g/day	
	Maximum Daily	Average Monthly	Maximum Daily	Average Monthly
Acenaphthene	47	19	1.8	0.7
Anthracene	47	19	1.8	0.7
Benzene	134	57	5.1	2.2
Bis(2-ethylhexyl)phthalate	258	95	9.8	3.6
Carbon Tetrachloride	380	142	14.4	5.4
Chlorobenzene	380	142	14.4	5.4
Chloroethane	295	110	11.2	4.2
Chloroform	325	111	12.3	4.2
Di-n-butyl phthalate	43	20	1.6	0.8
1,2-Dichlorobenzene	794	196	30.1	7.4
1,3-Dichlorobenzene	380	142	14.4	5.4
1,4-Dichlorobenzene	380	142	14.4	5.4
1,1-Dichloroethane	59	22	2.2	0.8
1,2-Dichloroethane	574	180	21.7	6.8
1,1-Dichloroethylene	60	22	2.2	0.8
1,2-trans-Dichloroethylene	66	25	2.5	0.9
1,2-Dichloropropane	794	196	30.1	7.4
1,3-Dichloropropylene	794	196	30.1	7.4
Diethyl phthalate	113	46	4.3	1.7
Dimethyl phthalate	47	19	1.8	0.7
4,6-Dinitro-o-cresol	277	78	10.5	3
Ethylbenzene	380	142	14.4	5.4
Fluoranthene	54	22	2.0	0.8
Fluorene	47	19	1.8	0.7
Hexachlorobenzene	794	196	30.1	7.4
Hexachlorobutadiene	380	142	14.4	5.4
Hexachloroethane	794	196	30.1	7.4
Methyl Chloride	295	110	11.2	4.2
Methylene Chloride	170	36	6.4	1.4
Naphthalene	47	19	1.8	0.7
Nitrobenzene	6,402	2,237	242.3	84.7
2-Nitrophenol	231	65	8.7	2.5
4-Nitrophenol	576	162	21.8	6.1
Phenanthrene	47	19	1.8	0.7
Pyrene	48	20	1.8	0.8
Tetrachloroethylene	164	52	6.2	2
Toluene	74	28	2.8	1.1
Total Cyanide	1,200	420	45.4	15.9
Total Lead	691	320	26.1	12.1
Total Zinc	2,610	1,050	98.8	39.7
1,2,4-Trichlorobenzene	794	196	30.1	7.4
1,1,1-Trichloroethane	59	22	2.2	0.8
1,1,2-Trichloroethane	127	32	4.8	1.2
Trichloroethylene	69	26	2.6	1
Vinyl Chloride	172	97	6.5	3.7

Table 6. Comparison of Overall Loading from Moses Lake Industries to the City of Moses Lake, Larson Treatment Plant

	Flow (mgd)		TDS (lbs/day)		Total N (lbs/day)		BOD (lbs/day)	
Moses Lake Industries	Avg	Max	Avg	Max	Avg	Max	Avg	Max
Actual:	0.0062	0.0169	16.2	89.1	0.8	2.1	4.5	54.9
Current Limits:	0.0100	0.0170	42.0	-	-	-	-	-
Proposed Limits:	0.0130	0.0220	62.0	-	-	-	-	-
Larson Influent	0.335	0.599	1,274.1	2,687.7	112.4	208.3	736.8	1,703.9
Percent Flow from M. L. Industries								
Actual:	1.87%	2.82%	1.27%	3.32%	0.70%	1.01%	0.61%	3.22%
Current Limits:	2.99%	2.84%	3.30%	-	-	-	-	-
Proposed Limits:	3.88%	3.67%	4.87%	-	-	-	-	-

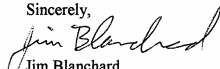
Table 7 - Port of Moses Lake Local Limits

Parameter	Six Month Average¹	Maximum Daily¹
BOD	20	40
Total Nitrogen	40	80
Total Kjeldahl Nitrogen	4.0	9.0
Fats, Oil, and Grease	20	40
Total Dissolved Solids	1,000	2,000
Conductivity, μ mhos/cm	1,600	3,200
pH, s.u.	5.5 to 8.0	5.0 to 9.0
Sodium Adsorption Ratio	6.0	9.0
Aluminum	5.0	20
Arsenic	0.1	2.0
Beryllium	0.1	0.5
Boron	1.0	2.0
Cadmium	0.01	0.05
Chromium	0.1	1.0
Cobalt	0.05	5.0
Copper	1.0	5.0
Fluoride	4.0	15
Iron	5.0	20
Lead	5.0	10
Lithium	2.5	2.5
Manganese	0.2	10
Molybdenum	0.01	0.05
Nickel	0.2	2.0
Selenium	0.02	0.02
Vanadium	0.1	1.0
Zinc	2.0	10

¹ All units in mg/L unless noted. Sodium Adsorption Ratio is a unitless parameter

APPENDIX D - RESPONSE TO COMMENTS

The Department received comments on the proposed permit from the Permittee. The following page includes the comment letter. The Department considered these comments and made changes to the permit as determined appropriate.

COMMENTS TO SWDP 5375, MOSES LAKE INDUSTRIES	RESPONSES
<div data-bbox="184 370 231 430" data-label="Image"></div> <div data-bbox="409 370 663 391" data-label="Section-Header">MOSES LAKE INDUSTRIES, INC.</div> <div data-bbox="270 404 405 440" data-label="Text">8248 Randolph Rd. NE Moses Lake, WA 98837</div> <div data-bbox="640 404 789 440" data-label="Text">Phone: (509) 762-5336 Fax: (509) 762-5981</div> <div data-bbox="455 477 567 500" data-label="Text"><u>Sent by FedEx</u></div> <div data-bbox="180 513 279 537" data-label="Text">July 18, 2006</div> <div data-bbox="180 550 424 647" data-label="Text">Mr. Pat Hallinan Washington Department of Ecology Eastern Regional Office 4601 N. Monroe Street Spokane, WA 99205-1295</div> <div data-bbox="180 662 699 685" data-label="Text">Subject: Comments on Draft State Waste Discharge Permit No. ST 5375</div> <div data-bbox="180 699 825 742" data-label="Text">In regard to the Draft State Waste Discharge Permit No. ST 5375, released for public comment on June 22, 2006, Moses Lake Industries, Inc. submits the following comments:</div> <div data-bbox="157 776 831 1130" data-label="List-Group"> <ol style="list-style-type: none"> 1. MLI understands the definition of Calendar Day in the permit to be as defined in the fact sheet "a calendar day or any 24 hour period that reasonably represents the calendar day for purposes of sampling" (Fact Sheet for SWD Permit No. 5375, p.10). 2. TKN, TSS, Nitrate+Nitrite, Ammonia, Chloride, Sodium, Sulfate testing frequency is listed as once per week. Historically, these types of parameters have been measured on a monthly basis, with no evidence of excursions. We therefore request that the testing frequency be maintained at the existing permit frequency of once per month for these parameters, rather than once per week. 3. We also request that the additional testing parameters required by the revised permit be made effective for the Discharge Monitoring Report beginning the month following formal permit issuance. This will allow us time to modify procedures, log sheets and coordinate with the laboratory. 4. Prior to the submittal of the first DMR report including the new parameters, we will need WDOE to revise the official DMR spreadsheet template. By making the new monitoring parameters effective in the month following permit issuance, there will be time to review, understand, and proofread the revised form. </div> <div data-bbox="176 1144 537 1167" data-label="Text">Thank you for your assistance in renewing our permit.</div> <div data-bbox="443 1203 516 1224" data-label="Text">Sincerely,</div> <div data-bbox="426 1206 644 1297" data-label="Text">  Jim Blanchard R&D Manager </div> <div data-bbox="680 480 869 596" data-label="Image"></div>	<ol style="list-style-type: none"> 1. The reference to 'Calendar Day' is found in the definition for the Maximum Daily Discharge Limitation which is defined as <i>'The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.'</i> For the purposes of reporting daily maximum discharges, either a calendar day may be used (12:00 am to 12:00 am), or any other 24 hour period that reasonably represents a calendar day (8:00 am to 8:00 am; 10:00 am to 10:00 am, etc.). 2. The monitoring frequencies for TKN, TSS, Nitrate+Nitrite, Ammonia, Chloride, Sodium, and Sulfate for the process wastewater discharged to the City of Moses Lake, Larson Treatment Plant have been reduced from once a week to once per month. 3. The final permit will be issued in August, with an effective date of September 1, 2006. This should allow enough time to adjust to the new monitoring parameters and frequencies. 4. The Department will provide an update spreadsheet that includes the new monitoring parameters and frequencies.